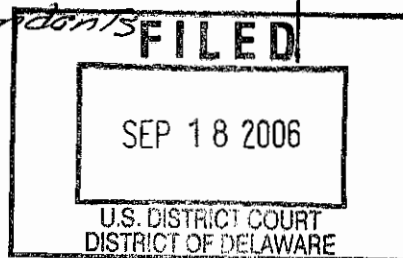


IN the United States District Court
FOR the DISTRICT OF Delaware

Charles P. Jones
Plaintiff

v.
Thomas Carroll, et al.,
Defendants

Plaintiff's First
Request for Production
of Documents



Civil Action No.
06-129-KAS

Scanned- BO 9/18/06

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff requests that Defendants Thomas Carroll, Peter Forbes, Aisha Profaci and Joe Romella produce for inspection and copying the following documents:

1. The complete Prison Records of inmate Anibal Melendez SBI #00337929. All disciplinary write-ups, 404 incident reports, inmate grievances, and medical records including all mental health records and reports made outside of and within the Department of Correction.
2. All medical and mental health records of Plaintiff from the time of his incarceration in Delaware Correctional Center through and including the date of your response to this request.
3. All written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Wilfred Beckles, Department of Correction.

4. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Jaime Nieves Jr., Department of Correction.

5. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Joseph S. Simon, Department of Correction.

6. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Timothy Timmons, Department of Correction.

7. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Kevin Hopkins, Sr. Department of Correction.

8. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Joseph Pomello, Department of Correction.

9. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Monica Watson, Department of Correction.

10. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Derrick Washington, Department of Correction.

11. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Alisha Profaci, Department of Correction.
12. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Peter Forbes, Department of Correction.
13. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Raina Scott, Department of Correction.
14. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Anibal Melendez, inmate, Department of Correction.
15. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by George Davis, inmate, Department of Correction.
16. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Fent County Paramedics.
17. all written and/or verbal statements, originals or copies, identifiable as reports about the incident on September 12, 2005 made by Gloria Watson, Registered Nurse Correctional medical services.

18. Any and all photographs of Plaintiffs' injuries, originals or copies, identifiable as evidence to the incident on September 12, 2005

19. Any and all photographs of Crime Scene, originals or copies, identifiable as evidence to the incident on September 12, 2005

September 13, 2006

Date: 5



Charles P. Jones

#00228197

DeBouck Corr. Center

1181 Paddock Rd.

Bay Area DeBouck

19977

Certificate of Service

I, Charles P. Jones, hereby certify that I have served a true

And correct cop(ies) of the attached: Plaintiffs' First Request For

Production of Documents upon the following

parties/person (s):

TO:

Clerk

TO:

'Delaware' District Court
Lock Box 18
844 King Street
Wilmington, Delaware 19801

TO:

Ophelia M. Waters

TO:

Deputy Attorney General
820 North French Street
6th Floor
Wilmington, Delaware 19801

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 13th day of September, 2006

IMC Charles P. Jones
SBI# 000228197 UNIT 712
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

WILMINGTON DE 197
15 SEP 2005 PM 2 L

Clerk
Delaware District Court
844 King Street Lock Box 18
Wilmington Delaware
19801

